

JUDGE STEIN

07 CRIM 1007

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

INDICTMENT

-v.- :

07 Cr.

SEKOU ABDOOL, :

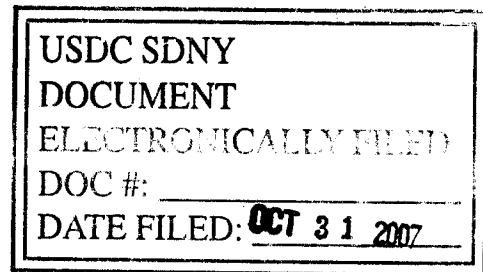
NOAH MENZIES, and :

GEORGE EDWARDS, :

Defendants. :

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COUNT ONE



The Grand Jury charges:

1. From in or about September 2006, up to and including in or about October 2006, in the Southern District of New York and elsewhere, SEKOU ABDOOL, NOAH MENZIES, and GEORGE EDWARDS, the defendants, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other, to commit offenses against the United States, to wit, to violate Title 18, United States Code, Section 1343.

2. It was a part and an object of the conspiracy that SEKOU ABDOOL, NOAH MENZIES, and GEORGE EDWARDS, the defendants, and others known and unknown, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, unlawfully, willfully, and knowingly, would and did transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce,

writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in a manner affecting a financial institution, in violation of Title 18, United States Code, Section 1343.

OVERT ACTS

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about October 4, 2006, SEKOU ABDOOL, the defendant, withdrew approximately \$20,000 from a Commerce Bank account at a branch located in Manhattan.

b. On or about October 11, 2006, NOAH MENZIES, the defendant, withdrew approximately \$40,000, from a Commerce Bank account at a branch located in Manhattan.

c. On or about October 16, 2006, GEORGE EDWARDS, the defendant, withdrew approximately \$30,000, from a Commerce Bank account at a branch located in Manhattan.

(Title 18, United States Code, Section 1349.)

FORFEITURE ALLEGATION

4. As the result of committing the offenses in violation of Title 18, United States Code, Section 1349, alleged in Count One of this Indictment, SEKOU ABDOOL, NOAH MENZIES, and GEORGE EDWARDS, the defendants, shall forfeit to the United

States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense, including but not limited to the following:

a. At least \$168,150 in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained as a result of the offenses charged in Counts One through Five of this Indictment, for which the defendants are jointly and severally liable.

Substitute Asset Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

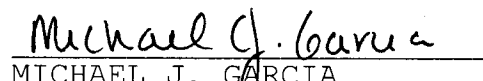
- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value;
- or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b) and 21 U.S.C. § 853(p), to seek forfeiture of any other

property of said defendant(s) up to the value of the above
forfeitable property.

(Title 18, United States Code, Section 981,
Title 28, United States Code, Section 2461, and
Title 18, United States Code, Section 2314.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

SEKOU ABDOOL,
NOAH MENZIES, and
GEORGE EDWARDS

Defendants.


INDICTMENT

07 Cr.

(18 U.S.C. § 1349)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL


Foreperson.

DIC 10/31/07: Post 11/1/87 indictment filed
A/W ordered. Assigned to Judge Stein.
Peck, M.J.